

January 24, 2011

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable-Compliance (MHA-C) Special Incentives Review  
Report; August 2010, Chandler, Arizona

Sent via secure e-mail delivery

Dear Ms. Gerber:

This letter from the undersigned Bank of America, N.A. and BAC Home Loans Servicing, LP ("Bank of America" or "BAC") responds to the matters in the above-referenced report ("Report"). In the Report, you requested that Bank of America management take certain required actions ("Actions") as part of our response to the observations noted in the Report.


This document contains confidential commercial or financial information of Bank of America and is exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. sections 552(b)(4) and 552(b)(8).

Terms used in this correspondence, and not otherwise defined, have the meanings contained in this letter. Set forth below is the MHAC Observation followed by Bank of America's corrective action plan.

(b)(4), (b)(8)



(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management

September 21, 2011

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Response to Making Home Affordable-Compliance (MHA-C) BANA Second Lien Modification Process Audit (2MP); March and April 2011, Greensboro, NC

Sent via secure e-mail delivery

Dear Ms. Gerber:

The purpose of this letter from the undersigned Bank of America, N.A. ("BANA") successor to BAC Home Loans Servicing, LP ("BAC") is to respond to the observations and related corrective action set forth in the above-referenced final observations report ("Report") issued by MHA-C as a result of the Second Lien Modification Process audit which took place in March and April 2011.

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Terms used in this correspondence, and not otherwise defined, have the meanings contained in this letter. Set forth below are the MHAC Observations followed by Bank of America's response and corrective action plans, if applicable.

This response will begin with a description of the scope of the review, then list the observations and go on to note for each observation, Bank of America's concurrence with the comment and any relevant action(s) taken or plan(s) with appropriate target dates for each step.

(b)(4), (b)(8)



(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management

April 14, 2011

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable- Compliance (MHA-C) July/August Second Look  
Observations; Simi Valley, CA; January 2011

Sent via secure e-mail delivery


Dear Ms. Gerber:

This letter from the undersigned Bank of America, N.A. and BAC Home Loans Servicing, LP ("Bank of America" or "BAC") responds to the matters in the above-referenced report ("Report"). In the Report, you requested that Bank of America management take certain required actions ("Actions") as part of our response to the observations noted in the Report.


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Terms used in this correspondence, and not otherwise defined, have the meanings contained in this letter. Set forth below are the MHA-C Observations followed by Bank of America's corrective action plans.

(b)(4), (b)(8)



(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management

May 27, 2011

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable- Compliance (MHA-C) Home Affordable Unemployment  
Program Review Observations; Fort Lauderdale, FL; December 2010

Sent via secure e-mail delivery

Dear Ms. Gerber:

This purpose of this letter from the undersigned Bank of America, N.A. and BAC Home Loans Servicing, LP ("Bank of America" or "BAC") is to respond to the observations and related corrective action set forth in the above-referenced report ("Report") issued by MHA-C as a result of its review the Home Affordable Unemployment Program ("UP") on January 28, 2011. In the Report, you requested that Bank of America management take certain required actions ("Actions") as part of our response to the observations noted in the Report.

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Terms used in this correspondence, and not otherwise defined, have the meanings contained in this letter. Set forth below are the MHA-C Observations followed by Bank of America's corrective action plans.

This response will begin with a description of the scope of the review, then list the observations and go on to note for each observation, Bank of America's action plan and the target dates for each step.

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(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management



June 27, 2011

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable- Compliance (MHA-C) IR2 Data Mapping Audit Observations;  
Thousand Oaks, CA; December 2010

Sent via secure e-mail delivery

Dear Ms. Gerber:

This letter from the undersigned Bank of America, N.A. and BAC Home Loans Servicing, LP ("Bank of America" or "BAC") is to respond to the observations and related corrective action set forth in the above-referenced final observations report ("Report") issued by MHA-C as a result of the IR2 Data Mapping audit which took place the week of December 13, 2010. In the Report, you requested that Bank of America Management take certain required actions ("Actions") as part of our response to the observations noted in the Report.


This document and all supporting attachments and exhibits contain confidential commercial or financial information of Bank of America and are exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. sections 552(b)(4) and 552(b)(8).

Terms used in this correspondence, and not otherwise defined, have the meanings contained in this letter.


Set forth below are the MHAC Observations followed by Bank of America's corrective action plan.

This response will begin with a description of the scope of the review, then list the observations and go on to note for each observation, Bank of America's actions taken and the target dates for each step.

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(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management

May 17, 2011

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable- Compliance (MHA-C) Adverse Actions; Simi Valley, CA; February 2011

Sent via secure e-mail delivery

Dear Ms. Gerber:

The purpose of this letter from the undersigned Bank of America, N.A. and BAC Home Loans Servicing, LP ("Bank of America" or "BAC") is to respond to the matters in the above-referenced report ("Report"). In the Report, you requested that Bank of America management take certain required actions ("Actions") as part of our response to the observations noted in the Report.

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This response will begin with a description of the scope of the review, then list the observations and go on to note for each observation, Bank of America's action plan and the target dates for each step.

(b)(4), (b)(8)



(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management

June 13, 2011

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable- Compliance (MHA-C) Solicitations Process Review Observations;  
Plano, TX; February 2011

Sent via secure e-mail delivery

Dear Ms. Gerber:


This letter from the undersigned Bank of America, N.A. and BAC Home Loans Servicing, LP ("Bank of America" or "BAC") is to respond to the observations and related corrective action set forth in the above-referenced final observations report ("Report") issued by MHA-C as a result of the Solicitations audit which took place the week of February 14, 2011. In the Report, you requested that Bank of America Management take certain required actions ("Actions") as part of your response to the observations noted in the Report.

This document and all supporting attachments and exhibits contains confidential commercial or financial information of Bank of America and is exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. sections 552(b)(4) and 552(b)(8).

Terms used in this correspondence, and not otherwise defined, have the meanings contained in this letter. Set forth below are the MHAC Observations followed by Bank of America's corrective action plan.

This response will begin with a description of the scope of the review, then list the observations and go on to note for each observation, Bank of America's actions taken and the target dates for each step.

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We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management

September 19, 2011

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable- Compliance (MHA-C) HAFA Audit; Plano, TX; June 2011

Sent via secure e-mail delivery

Dear Ms. Gerber:

This letter from the undersigned Bank of America, N.A. (BANA), successor to BAC Home Loans Servicing, LP ( "BAC") is to respond to the observations and related corrective action set forth in the above-referenced final observations report ("Report") issued by MHA-C as a result of the HAFA audit which took place the week of May 30, 2011. In the Report, you requested that Bank of America Management take certain required actions ("Actions") as part of our response to the observations noted in the Report.

This document and all supporting attachments and exhibits contain confidential commercial or financial information of Bank of America and are exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. sections 552(b)(4) and 552(b)(8).

Terms used in this correspondence and not otherwise defined, have the meanings contained in this letter.


Set forth below are the MHAC Observations followed by Bank of America's corrective action plan.

This response will begin with a description of the scope of the review, then list the observations and go on to note for each observation, Bank of America's actions taken and the target dates for each step.

(b)(4), (b)(8)



(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management



October 6, 2011

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable- Compliance (MHA-C) HAFA Review Observations; Plano, TX; June 2011; Response to MHA-C's Follow-Up Inquiries

Sent via secure e-mail delivery


Dear Ms. Gerber:

The purpose of this letter from the undersigned Bank of America, N.A. successor to BAC Home Loans Servicing, LP (BANA) is to respond to the inquiries received from MHA-C following the submission of the BANA HAFA Audit Response dated September 19, 2011.


This document and all supporting attachments and exhibits contains confidential commercial or financial information of Bank of America and is exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. sections 552(b)(4) and 552(b)(8).

Terms used in this correspondence, and not otherwise defined, have the meanings contained in this letter. Set forth below are the MHA-C Observations followed by Bank of America's response.

(b)(4), (b)(8)



(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management

December 24, 2010

Victor F. O'Laughlen  
Vice President Servicer Oversight  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable-Compliance (MHA-C) April/June Second Look Audit;  
November 2010, Simi Valley, California

Sent via secure e-mail delivery

Dear Mr. O'Laughlen:

This letter from the undersigned Bank of America, N.A. and BAC Home Loans Servicing, LP ("Bank of America" or "BAC") responds to the matters in the above-referenced report ("Report"). In the Report, you requested that Bank of America management respond to the observations, and if we agree, provide a detailed remediation plan, and if we disagree, provide a detailed explanation and evidence to support our position.


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Terms used in this correspondence, and not otherwise defined, have the meanings contained in this letter. Set forth below in bold is the MHAC observation followed by Bank of America's response and corrective action plan.

(b)(4), (b)(8)



(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management

November 18, 2010

Tammy Gerber  
Compliance Director  
Making Home Affordable – Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22101

RE: Making Home Affordable – Compliance (MHA-C) Audit Report dated September 8, 2010; Home  
Loan Services, Inc; March 2010 Audit

Dear Ms. Gerber:

Effective October 16, 2010 Home Loan Services, Inc (“HLS”) was merged into BAC Home Loans Servicing, LP (“BACHLS”). This letter from the undersigned BACHLS responds to the matters in the above referenced report (“Report”). In your cover letter and the Report, you request that BACHLS management submit detailed action plans (“Plans”) as part of our response to the issues and concerns noted in the Report.

BACHLS requests confidential treatment for this letter which contains confidential information concerning the business plans and internal business processes of BACHLS and confidential supervisory information. This information is not available to the public and is exempt from disclosure under exemptions (b)(4) and (b)(8) of the Freedom of Information Act, 5 U.S.C. Sections (b)(4), (b)(8). Disclosure of this information would result in substantial competitive harm to BACHLS.

Terms used in this correspondence, and not otherwise defined, have the meanings contained in this letter. Set forth below in italicized bold print are the MHA-C observations followed by BACHLS’ response and corrective action plans where applicable.

We trust that this communication provides you with the information you require. Please do not hesitate to contact me at (412) 918-7617, if you should have further questions.

Very truly yours,



Nanette M. Stevens  
Mortgage Servicing Executive  
BACHLS Pittsburgh Default Servicing Sites

Cc: Rebecca Mairone  
Karen Stiehl  
Consumer Regulatory Relations  
Enterprise Regulatory Relations

Attachment

August 30, 2010

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable- Compliance (MHA-C) Audit Report Dated July 23, 2010  
Simi Valley, CA and Plano, TX; March 2010 Review

Sent via secure e-mail delivery

Dear Ms. Gerber:

This letter from the undersigned Bank of America, N.A. and BAC Home Loans Servicing, LP ("Bank of America" or "BAC") responds to the matters in the above-referenced report ("Report"). In your cover letter and the Report, you requested that Bank of America management submit detailed action plans ("Plans") as part of our response to the issues and concerns noted in the Report.


Bank of America requests confidential treatment for this letter, which contains confidential information concerning the business plans and internal business process of Bank of America and confidential supervisory information. This information is not available to the public and is exempt from disclosure under exemptions (b)(4) and (b)(8) of the Freedom of Information Act, 5 U.S.C. Sections (b)(4), (b)(8). Disclosure of this information would result in substantial competitive harm to Bank of America.

Terms used in this correspondence, and not otherwise defined, have the meanings contained in this letter. Set forth below in bold are the MHAC Observations followed by Bank of America's corrective action plans.

(b)(4), (b)(8)

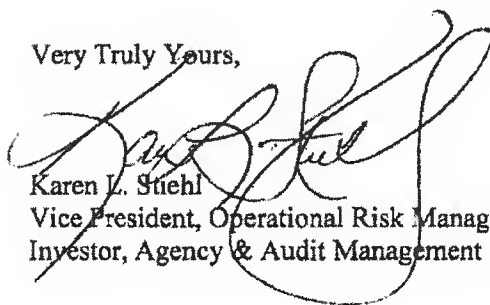


(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,



Karen L. Stiehl  
Vice President, Operational Risk Manager  
Investor, Agency & Audit Management

CC: Enterprise Regulatory Relations

August 25, 2011

Tammy Gerber  
Compliance Director  
Making Home Affordable-Compliance  
8000 Jones Branch Drive, Mailstop C31  
McLean, VA 22102

RE: Making Home Affordable- Compliance (MHA-C) Cash Remittance Review; Plano, TX; May 2011

Sent via secure e-mail delivery

Dear Ms. Gerber:


The purpose of this letter from the undersigned Bank of America, N.A. successor to BAC Home Loans Servicing, LP (BANA) is to respond to the matters in the above-referenced report ("Report"). In the Report, you requested that Bank of America management take certain required actions ("Actions") as part of our response to the observations noted in the Report.

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This response will begin with a description of the scope of the review, then list the observations and go on to note for each observation, Bank of America's action plan and the target dates for each step.

(b)(4), (b)(8)





(b)(4), (b)(8)



We trust that this communication provides you with the information you require. Please do not hesitate to contact Karen Stiehl at (805) 306-8205, if you should have further questions.

Very Truly Yours,

Karen L. Stiehl  
Vice President, Business Control Manager  
Investor, Agency & Audit Management